

DMB:JJT:nz

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ISSA MUTLAQ,

Plaintiff,

v.

JOHN CROSSON, whom is an  
Immigration and Naturalization  
Service Deportation Officer,  
STEVEN M. WACHA, whom is an  
Officer of the Immigration and  
Naturalization Service, and  
CHARLES ZEMSKI, whom is the  
District Director of the  
Immigration and Naturalization  
Service,

Defendants.

**FILED**  
HARRISBURG, PA

FEB 12 2001

MARIE D'ANDREA CLERK  
Per *[Signature]* Deputy Clerk

NO. 1:CV-00-1996

(KANE, J.)

MOTION FOR ENLARGEMENT OF TIME

COMES NOW, the United States of America, by its attorneys, David M. Barasch, United States Attorney for the Middle District of Pennsylvania, and Joseph J. Terz, Assistant United States Attorney for the same district, and respectfully represents to the Court the following facts:

1. On November 13, 2000, the Plaintiff filed a Civil Complaint with this Court pursuant to 42 U.S.C. § 1983.
2. On December 14, 2000, the Summons and Complaint were served upon the U.S. Attorney's Office indicating a response due date within 60 days, or February 12, 2001.

3. The investigative agency will require an additional thirty (30) days to obtain representation for the individually named defendants from the United States Department of Justice, as well as provide the U.S. Attorney's Office with a litigation report and copies of all relevant documents.

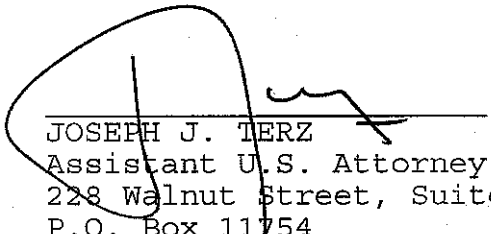
4. The undersigned did not seek Plaintiff's concurrence because Issa Mutlaq is currently incarcerated and is proceeding pro se.

6. The Plaintiff's claim will not be prejudiced by this short continuance.

WHEREFORE, respondent requests that the Court grant a thirty (30) day extension of time to respond to this Complaint.

Respectfully submitted,

DAVID M. BARASCH  
United States Attorney



JOSEPH J. TERZ  
Assistant U.S. Attorney  
228 Walnut Street, Suite 220  
P.O. Box 11754  
Harrisburg, Pennsylvania 17108-1754  
(717) 221-4482

Date: February 12, 2001

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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ISSA MUTLAQ,	:
	:
Plaintiff,	:
	:
	: NO. 1:CV-00-1996
v.	:
	:
JOHN CROSSON, et al.,	: (KANE, J.)
	:
Defendants.	:

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

That this 12th day of February, 2001, she served a copy of the attached

MOTION FOR ENLARGEMENT OF TIME

by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania.

ADDRESSEE:

Issa Mutlaq, Inmate No. 0000327  
SNYDER COUNTY PRISON  
600 Old Colony Road  
Selinsgrove, Pennsylvania 17870

  
Naomi Zimmerman  
Legal Secretary